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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,  
  
Individual and Representative Plaintiffs,  
  
v.  
  
META PLATFORMS, INC., a Delaware  
corporation,  
  
Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF MICHELLE WOODHOUSE  
IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO CONSIDER  
WHETHER ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE: ADMINISTRATIVE  
MOTION REQUESTING LEAVE TO OBTAIN  
LIMITED ADDITIONAL DISCOVERY  
[DKT. 636]**

1 I, Michelle Woodhouse, hereby declare:

2 1. I am an Associate General Counsel for Defendant, Meta Platforms, Inc. (“Meta”). I  
3 provide this Declaration based on my personal knowledge and/or after a reasonable investigation  
4 of the relevant facts. If called to testify as a witness, I could and would testify competently thereto.

5 2. Pursuant to Civil L.R. 79-5(f)(3), I make this Declaration in support of Plaintiffs’  
6 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (Dkt. 636)  
7 (“Motion”).

8 3. For the reasons detailed herein, Meta seeks leave to file under seal portions of certain  
9 documents filed by Plaintiffs in support of Plaintiffs’ Motion.

Document	Sealing Request
Woodhouse Exhibit 1 – Declaration of David R. Choffnes	Redacted portions
Woodhouse Exhibit 2 – Exhibit C to Pritt Declaration	Redacted portions
Woodhouse Exhibit 3 – Exhibit D to Pritt Declaration	Redacted portions
Woodhouse Exhibit 4 – Exhibit Q to Pritt Declaration	Redacted portions

16 4. Meta seeks the Court’s permission to file under seal discrete portions of the  
17 following exhibits, as further explained below.

18 5. **Meta Employee PII.** Meta respectfully requests the Court’s permission to redact  
19 limited portions of **Woodhouse Exhibits 2 and 3**, that reflect employees’ personal identifiable  
20 information (PII), namely, the email addresses for Meta’s individual employees, who are not parties  
21 to the case. Such information has been redacted to protect employee privacy and to avoid the risk  
22 of third parties’ unauthorized and/or illicit use of the information, such as for automated or  
23 unwanted solicitation or contact. Meta has previously requested to seal documents based on the  
24 same personal identifiable information, (e.g., Dkt. 391-1 ¶ 5; Dkt. 409-1 ¶¶ 3, 7–8, 10), which this  
25 Court has granted, (e.g., Dkt. 393; Dkt. 414).

26 6. **Meta’s Cybersecurity Information.** Meta respectfully requests the Court’s  
27 permission to redact limited portions of **Woodhouse Exhibits 1-4** that reflect hyperlinks, file paths,  
28

1 and certain file names (*e.g.*, links to access Meta’s internally stored documents and data), which  
2 point to Meta’s confidential and proprietary information and sensitive features of its internal  
3 systems. These materials are maintained with restricted access in the ordinary course of Meta’s  
4 business and are not generally known to the public or Meta’s competitors. Disclosure of this  
5 confidential and proprietary information about Meta’s infrastructure may increase the risk of  
6 cybersecurity threats or breaches as third parties may seek to gain access to and use the information  
7 to compromise and intrude upon Meta’s internal systems and other confidential information.  
8 Accordingly, hyperlinks, file paths, and file names have been sufficiently redacted to mitigate these  
9 risks. Meta previously requested to seal documents based on the same concerns regarding network  
10 security, (*e.g.*, Dkt. 391-1 ¶ 9), which this Court has granted, (*e.g.*, Dkt. 393).

11       7.     **Meta’s Trade Secret Technical Information.** Meta respectfully requests the  
12 Court’s permission to redact limited portions of **Woodhouse Exhibits 3 and 4** that reflect Meta’s  
13 highly sensitive, confidential, technical, and trade secret information. For example, **Exhibit 3**  
14 contains nonpublic and proprietary large language model training data information, including a list  
15 of datasets used internally at Meta for purposes including training, which are not at issue in this  
16 litigation. **Exhibit 4** includes discussion of specific source code files, quotations of source code,  
17 and discussion of how the source code performs certain actions. Public disclosure of this  
18 information would expose Meta to competitive harm by enabling competitors to utilize Meta’s  
19 proprietary techniques and results of extensive development efforts in its own products.  
20 Accordingly, maintaining the confidentiality of this information is critical to Meta’s business and  
21 Meta treats this information as highly confidential, trade secret. Meta has previously requested to  
22 seal documents based on similar nonpublic business strategies, technical information, and trade  
23 secret information pertaining to its generative AI offerings, (*e.g.*, Dkt. 266-1 ¶ 6), which this Court  
24 has granted, (*e.g.*, Dkt. 317 (granting Dkt. 266)).

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1  
2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct.

4 Executed in San Jose, California on this 5th day of November 2025.

5  
6   
7 Michelle Woodhouse